1 2 3 4 5 6 7	Michele R. Stafford, Esq. (SBN 172509) Erica J. Russell, Esq. (SBN 274494) SALTZMAN & JOHNSON LAW CORPORATI 44 Montgomery Street, Suite 2110 San Francisco, CA 94104 Telephone: (415) 882-7900 Facsimile: (415) 882-9287 mstafford@sjlawcorp.com erussell@sjlawcorp.com Attorneys for Plaintiffs	ON	
8	UNITED STATES DISTRICT COURT		
9	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
10			
11	RUSSELL E. BURNS, et al.,	Case No.: C1	4-1798 VC
12	Plaintiffs,		S' REQUEST TO CONTINUE AGEMENT CONFERENCE;
13	V.	PROPOSE	ORDER THEREON
14	B & B Sweeping, a California Limited Liability Company; Brett Herring, an individual,	Date: Time:	September 23, 2014 10:00 a.m.
15	Defendants.	Location:	450 Golden Gate Avenue San Francisco, CA 94102
16		Judge:	Courtroom 4, 17 th Floor Honorable Vince Chhabria
17			
18	Plaintiffs respectfully request that the Case Management Conference, currently on calendar		
19	for September 23, 2014, be continued for approximately forty-five (45) days. Good cause exists		
20	for the granting of the continuance, as follows:		
21	1. As the Court's records will reflect, this action was filed on April 18, 2014. The		
22	Defendants were served on April 24, 2014, and Proofs of Service of Summons were filed with the		
23	Court on May 2, 2014 (Dkt. #11 and #12). Defendants failed to plead or otherwise respond to the		
24	lawsuit, and the Clerk entered default as to Defendants on June 25, 2014 (Dkt. #15). Defendants		
25	were duly served with a copy of the Clerk's Notice of Default Entry, and a Proof of Service of		
26	same was filed with the Court on June 26, 2014 (Dkt. #16).		
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1	2. While Plaintiffs anticipated filing a Motion for Default Judgment by mid-August,			
2	the parties were communicating and Plaintiffs attempted to reach an informal resolution with			
3	Defendants by again offering Defendants the opportunity to enter into a payment plan for the			
4	amounts owed to Plaintiffs. However, Defendants failed to enter into a payment plan, therefore			
5	Plaintiffs continued their preparation of and are finalizing a Motion for Default			
6	Judgment. Plaintiffs will file the Motion for Default Judgment within seven (7) days from today'			
7	date.			
8	3. There are no issues that need to be addressed by the parties at the currently			
9	scheduled Case Management Conference. In the interest of conserving costs as well as the Court's			
10	time and resources, Plaintiffs respectfully request that the Court continue the currently scheduled			
11	Case Management Conference for approximately 45 days to coincide with the hearing date of the			
12	Motion for Default Judgment.			
13	I declare under penalty of perjury that I am the attorney for the Plaintiffs in the above			
14	entitled action, and that the foregoing is true of my own knowledge.			
15	Executed this 16 th day of September 2014, at San Francisco, California.			
16	SALTZMAN & JOHNSON			
17	LAW CORPORATION			
18	By: /S/			
19	Erica J. Russell Attorneys for Plaintiffs			
20	Attorneys for Flaments			
21	IT IS SO ORDERED.			
22	The currently set Case Management Conference is hereby continued to			
23	November 4, 2014 at 10:00 a.m., and all previously set deadlines and dates related to this			
24	case are continued accordingly.			
25	Date: September 18, 2014			
26	UNITED STATES DISTRICT COURT JUDGE			

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